

EXHIBIT 4

EXHIBIT A

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

EXHIBIT A

Comparison of Claims 1, 13, and 23 of the '313 Patent to GB 2 355 156 B to Beart ("Beart"), GB 2 377 802 A to Leeson ("Leeson"), U.S. Patent No. 5,823,302 to Schweninger ("Schweninger"), and U.S. Patent No. 6,271,755 to Prather ("Prather"). To the extent that Beart, Leeson, Schweninger, and/or Prather do not teach certain limitations of claims 1, 13, and 23, such limitations would have been inherent and/or obvious. Claims 1, 13, and 23 are also obvious in view of each reference alone or in combination with other prior art references, including, but not limited to, one or more of the references identified in the below chart.

The following chart is meant to be exemplary only, and does not represent an exhaustive lists of evidence or contentions.

Claim	Elements	PRIOR ART
1	A shopping cart wheel assembly configured to attach to a shopping cart to enable usage of the shopping cart to be monitored and controlled, the shopping cart wheel assembly comprising:	<p><u>BEART</u> Page 4, lines 16-18: "To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley."</p> <p><u>LEESON</u> Abstract: "A security system for use in a supermarket having at least one entrance and exit 13 consisting of an electronic tag located on a supermarket trolley."</p> <p><u>SCHWENINGER</u> Abstract: "For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area."</p> <p>Col. 1, lines 5-7: "The present invention relates to brake constructions for a shopping cart wheel or the like, and particularly those which are activated by perimeter theft control signals."</p> <p><u>PRATHER</u> Col. 2, lines 48-52: "Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises."</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	a wheel;	<p>BEART Page 4, lines 16-18: “To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley.”</p> <p>SCHWENINGER Col. 2, lines 8-10: “The brake assembly includes a toggle positionable alternatively in non-braking and braking positions relative to the wheel.”</p> <p>PRATHER Col. 2, lines 48-57: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises. Another object of the present invention is to provide a pair of redundant wheels on the shopping cart that work, in conjunction with the disabling assembly when it is actuated, to limit the range of motion in a forward pushing direction to purely circular motion.”</p>
	a brake capable of being activated to inhibit rotation of the wheel;	<p>BEART Page 4, lines 16-18: “To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley.”</p> <p>SCHWENINGER Col. 2, lines 8-10: “The brake assembly includes a toggle positionable alternatively in non-braking and braking positions relative to the wheel.”</p> <p>PRATHER Col. 2, lines 48-57: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises. Another object of the present invention is to provide a pair of redundant wheels on the shopping cart that work, in conjunction with the disabling assembly when it is actuated, to limit the range of motion in a forward pushing direction to purely circular motion.”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	a controller configured to control the brake;	<p>BEART Page 3, lines 12-14: “The processing means in each of the Emitting and Detecting means separately may be hard-wired logic (possibly within an ASIC), a microprocessor or micro-controller, in each case containing some amount of memory storage.”</p> <p>SCHWENINGER Col. 2, lines 31-32: “Also, there is adequate space for complicated circuit board or electronic controls inside the wheel.”</p> <p>PRATHER Col. 6, lines 26-28: “A sensor 130, mounted on the support 100, detects the triggering signal. The sensor transmits a disabling signal via a conduit 135 (eg, a wire) when a triggering signal is detected.”</p>
	a very low frequency (VLF) receiver coupled to the controller; and	<p>BEART Abstract: “A security system for protecting articles 8, the system comprising at least one Electronic Article Surveillance (EAS) loop 4, one Emitting Unit 7 and one Detecting Unit 9 attached to each article 8 to be protected, the Detecting Unit 9 having means to detect electromagnetic fields emitted by the EAS loop 4 and the Emitting Unit 7 and to distinguish between them.”</p> <p>Page 1, lines 23-24: “Various tag-construction and tag-detection methods are employed by these systems, operating at various frequencies from several 100Hz to 100kHz and above.”</p> <p>Page 2, lines 22-26: “The Emitting Unit comprises a processing means and an electromagnetic field generation means, the processing means being adapted to control the electromagnetic field generation means such that the emitted field is distinct in some characteristic way from that emitted by the EAS loop, for example but not limited to having a distinct frequency and/or pulse-rate.”</p> <p>Page 12, lines 7-10: “In this embodiment, EAS loops or gates 4 are present at all the exits 3 of the supermarket store, and an Emitting Unit 7 is located within or close to every point of</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>payment, for example within each checkout lane 6 of the supermarket.”</p> <p><u>LEESON</u> Page 3, para. 5: “Each trolley used within the store carries a readable information tag which serves to uniquely identify the trolley by a reader device.”</p> <p>Page 4, para. 2: “Hereafter the customer with their trolley can now pass out of the building by way of the combined entrance and exit 13. In the case of an ‘unlocked’ trolley the alarm readers A1, A2 will not sense a trolley being used for an illicit purpose.”</p> <p><u>SCHWENINGER</u> Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 2, lines 3-5: “When the carts are wheeled beyond the perimeter, an audio frequency signal automatically actuates the brake.”</p> <p>Col. 3, lines 33-36: “Transmitter 74 sends a low frequency signal in the five kilohertz range on the conductor or peripheral wire, and the signal is strong enough so that it can be picked up five to fifteen feet away.”</p> <p><u>PRATHER</u> Col. 3, lines 63-Col. 4, lines 17: “Sensor comprising means for transmitting a trigger signal when a magnetic field or audio frequency is detected.”</p> <p>Col. 6, lines 21-25: “The suspension assembly of the cart is disabled by a triggering signal, such as an audio, magnetic or radio frequency signal, which is detected when the cart is pushed past a signal emitting member, such as an underground cable or a line-of-sight emitter.”</p>
	a radio frequency (RF) transceiver coupled to the	<p><u>BEART</u> Page 3, lines 28-Page. 4, lines 3: “The alarm means of the Detecting Unit may be provided by one or more of the</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

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	controller, the RF transceiver configured to send and receive data in a 2.4 GHz frequency band;	<p>following: . . . radio frequency or other electromagnetic transmitter.”</p> <p><u>LEESON</u></p> <p>Page 3, para. 5: “Each trolley used within the store carries a readable information tag which serves to uniquely identify the trolley by a reader device.”</p> <p>Page 4, para. 2: “Having completed the purchase transaction the customer passes along path P1 through the region of the reader U1 which reads the information tag on the trolley and passes it by way of the network the control unit 20 operates to record the trolley as now being in a second, unlocked state, category.”</p> <p><u>PRATHER</u></p> <p>Col. 6, lines 21-25: “The suspension assembly of the cart is disabled by a triggering signal, such as an audio, magnetic or radio frequency signal, which is detected when the cart is pushed past a signal emitting member, such as an underground cable or a line-of-sight emitter.”</p>
	wherein the controller is configured to determine whether to activate the brake in response to detection of a VLF signal by the VLF receiver based at least partly on content of RF transmissions received by the RF transceiver.	<p><u>BEART</u></p> <p>Abstract: “A security system for protecting articles 8, the system comprising at least one Electronic Article Surveillance (EAS) loop 4, one Emitting Unit 7 and one Detecting Unit 9 attached to each article 8 to be protected, the Detecting Unit 9 having means to detect electromagnetic fields emitted by the EAS loop 4 and the Emitting Unit 7 and to distinguish between them, and a means of causing an alarm if a predetermined sequence of fields is detected, eg if the detecting unit enters an establishment at entrance 1 and leaves via exit 3 without having first passed through checkout 6.”</p> <p>Page 12, lines 29-Page. 13, lines 21: “In this example, if the second customer is a criminal attempting a push-out they will not pass the checkout lane 6 before exiting...The Detecting Unit 9 has now detected the EAS field three times in a row since the last detection of the Emitting Unit 7 and immediately causes an alarm. . . . Any attempt to leave without ‘recharging’ the Detecting Unit 9 at the checkout lane 6 will cause a ‘debt’ on the next exit and thus trigger an alarm.”</p>

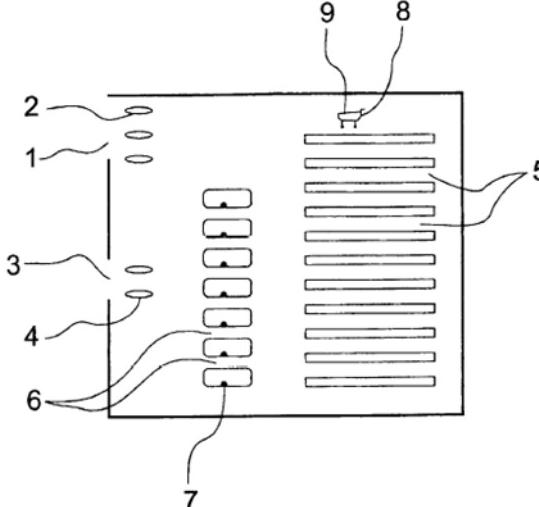
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p><u>LEESON</u></p> <p>Abstract: “The tag is normally in one state and changes to a second state whilst travelling on path P1 when it passes through a checkout 16 and payment for the goods is confirmed. The trolley may then leave the supermarket. Alternatively if the trolley moves along a second path P2 and payment for the goods is not received the tag changes from state 1 to state 3 and an alarm is triggered upon passing through the exit.”</p> <p>Page 3, para. 6-Page 4, para. 3: “Having completed the purchase transaction the customer passes along path P1 through the region of the reader U1 which reads the information tag on the trolley and passes it by way of the network the control unit 20 operates to record the trolley as now being in a second, unlocked state, category...However cases will arise where a customer having selected items they require from shelves 12A - J do not proceed to the plurality 16 of checkouts so as to follow path P1 to proceed out of the store but choose for some reason to proceed along path P2 leading to the combined entrance and exit 13. The alarm readers will detect the presence of the information tag on the trolley and from the information stored in the network on control unit 20 that the trolley is in its first, locked state, category. The control unit 20 will initiate an alarm such as a light or sound signal and cause a security panel to display a suitable message to enable staff to approach the entrance and exit 13, identify the trolley and establish the reason for an attempt being made to remove from the store a trolley in a locked state.”</p> <p><u>SCHWENINGER</u></p> <p>Col. 2, lines 3-5: “When the carts are wheeled beyond the perimeter, an audio frequency signal automatically actuates the brake.”</p> <p>Col. 2, lines 8-18: “The signal actuates a battery-powered solenoid coil which magnetically draws the catch away from the toggle. This releases the toggle from its non-braking position to a braking position relative to the wheel and against an interior wheel surface pursuant to an inside-the-wheel embodiment of the brake assembly) or an exterior wheel surface (pursuant to an outside-the-wheel embodiment).”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>Col. 4, lines 24-34: “When the frequency signal is detected, the solenoid 120 is activated briefly (e.g., for one and one half seconds), just long enough to draw the flat spring 156 and release the toggle 150.”</p> <p><u>PRATHER</u></p> <p>Col. 2, lines 48-52: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises.”</p>
13	<p>A system for monitoring and controlling shopping cart usage, the system comprising:</p>	<p><u>BEART</u></p> <p>Page 4, lines 16-18: “To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley.”</p> <p><u>LEESON</u></p> <p>Abstract: “A security system for use in a supermarket having at least one entrance and exit 13 consisting of an electronic tag located on a supermarket trolley.”</p> <p><u>SCHWENINGER</u></p> <p>Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 1, lines 5-7: “The present invention relates to brake constructions for a shopping cart wheel or the like, and particularly those which are activated by perimeter theft control signals.”</p> <p><u>PRATHER</u></p> <p>Col. 2, lines 48-52: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises.”</p>
	<p>a plurality of devices positioned at respective</p>	<p><u>BEART</u></p> <p>Page 2, lines 28-29: “Alternatively the generation means</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

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	checkout lanes of a store, each device comprising a respective antenna and configured to transmit data packets in a 2.4 GHz frequency band;	<p>may be a whip or helical wire antenna or dielectric resonator antenna.”</p> <p>Page 11, lines 26-Page 12, lines 3: “Figure 1 shows a plan view of a supermarket store in schematic form, the store having an entrance 1 guarded by EAS loops or gates 2, an exit 3 guarded by EAS loops or gates 4, a number of aisles 5 in which goods (not shown) are displayed for sale, and a number of checkout lanes 6 through which honest customers will pass and 30 where payment is made for selected goods, each checkout lane 6 being provided with an Emitting Unit 7. There is also shown a trolley 8 provided with a Detecting Unit 9. The trolley 8 is shown in more detail in Figure 2, with the Detecting Unit 9 being mounted on a front portion of the trolley 8, and the trolley 8 being in proximity to an Emitting Unit 7.”</p> <p>FIG. 1:</p>  <p>Fig. 1</p> <p>LEESON</p> <p>Page 3, para. 4: “To resist this unauthorised removal of goods the store is equipped with an information handling network comprising linked items: information readers made up of -</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

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	<p>a shopping cart wheel assembly attached to a shopping cart, the shopping cart wheel assembly comprising a wheel, a brake capable of being activated to inhibit rotation of the wheel, a controller configured to control the brake, a very low frequency (VLF) receiver coupled to the controller, and a radio frequency (RF) transceiver coupled to the controller, the RF transceiver configured to send and receive data packets in the 2.4 GHz frequency band, wherein the wheel assembly is configured to use the data packets transmitted by said devices to detect entry of the shopping cart into a checkout zone of the store; and</p>	<p>locking readers L1 - L3 in the vicinity of the shelves 12A -J, unlocking reader U1 at exit from the plurality 16 of checkouts.”</p> <p>BEART</p> <p>Abstract: “A security system for protecting articles 8, the system comprising at least one Electronic Article Surveillance (EAS) loop 4, one Emitting Unit 7 and one Detecting Unit 9 attached to each article 8 to be protected, the Detecting Unit 9 having means to detect electromagnetic fields emitted by the EAS loop 4 and the Emitting Unit 7 and to distinguish between them.”</p> <p>Page 1, lines 23-24: “Various tag-construction and tag-detection methods are employed by these systems, operating at various frequencies from several 100Hz to 100kHz and above.”</p> <p>Page 2, lines 22-26: “The Emitting Unit comprises a processing means and an electromagnetic field generation means, the processing means being adapted to control the electromagnetic field generation means such that the emitted field is distinct in some characteristic way from that emitted by the EAS loop, for example but not limited to having a distinct frequency and/or pulse-rate.”</p> <p>Page 3, lines 12-14: “The processing means in each of the Emitting and Detecting means separately may be hard-wired logic (possibly within an ASIC), a microprocessor or microcontroller, in each case containing some amount of memory storage.”</p> <p>Page 3, lines 28-Page. 4, lines 3: “The alarm means of the Detecting Unit may be provided by one or more of the following: . . . radio frequency or other electromagnetic transmitter.”</p> <p>Page 4, lines 16-18: “To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley.”</p> <p>Page 12, lines 7-10: “In this embodiment, EAS loops or gates 4 are present at all the exits 3 of the supermarket store, and an Emitting Unit 7 is located within or close to every point of</p>

**Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)**

Claim	Elements	PRIOR ART
		<p>payment, for example within each checkout lane 6 of the supermarket.”</p> <p>Page 12, lines 13-27: “Fill trolley 8 with goods and visit checkout lane 6 (past Emitting Unit 7) . . . Detect field from Emitting Unit 7 as a first customer pays at checkout lane 6.”</p> <p><u>LEESON</u></p> <p>Abstract: “A security system for use in a supermarket having at least one entrance and exit 13 consisting of an electronic tag located on a supermarket trolley.”</p> <p>Page 3, para. 5: “Each trolley used within the store carries a readable information tag which serves to uniquely identify the trolley by a reader device.”</p> <p>Page 4, para. 2: “In most cases the customer having selected the items they require will proceed to one of the checkout in the plurality 16 to pay for the selected items carried in their trolley. Having completed the purchase transaction the customer passes along path P1 through the region of the reader U1 which reads the information tag on the trolley and passes it by way of the network the control unit 20 operates to record the trolley as now being in a second, unlocked state, category. Hereafter the customer with their trolley can now pass out of the building by way of the combined entrance and exit 13. In the case of an 'unlocked' trolley the alarm readers A1, A2 will not sense a trolley being used for an illicit purpose.”</p> <p><u>SCHWENINGER</u></p> <p>Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 1, lines 5-7: “The present invention relates to brake constructions for a shopping cart wheel or the like, and particularly those which are activated by perimeter theft control signals.”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>Col. 2, lines 3-5: “When the carts are wheeled beyond the perimeter, an audio frequency signal automatically actuates the brake.”</p> <p>Col. 2, lines 8-10: “The brake assembly includes a toggle positionable alternatively in non-braking and braking positions relative to the wheel.”</p> <p>Col. 2, lines 31-32: “Also, there is adequate space for complicated circuit board or electronic controls inside the wheel.”</p> <p>Col. 3, lines 33-36: “Transmitter 74 sends a low frequency signal in the five kilohertz range on the conductor or peripheral wire, and the signal is strong enough so that it can be picked up five to fifteen feet away.”</p> <p>PRATHER</p> <p>Col. 2, lines 48-57: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises. Another object of the present invention is to provide a pair of redundant wheels on the shopping cart that work, in conjunction with the disabling assembly when it is actuated, to limit the range of motion in a forward pushing direction to purely circular motion.”</p> <p>Col. 3, lines 63-Col. 4, lines 17: “Sensor comprising means for transmitting a trigger signal when a magnetic field or audio frequency is detected.”</p> <p>Col. 6, lines 21-25: “The suspension assembly of the cart is disabled by a triggering signal, such as an audio, magnetic or radio frequency signal, which is detected when the cart is pushed past a signal emitting member, such as an underground cable or a line-of-sight emitter.”</p> <p>Col. 6, lines 26-28: “A sensor 130, mounted on the support 100, detects the triggering signal. The sensor transmits a disabling signal via a conduit 135 (eg, a wire) when a triggering signal is detected.”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	<p>a VLF transmitter configured to transmit a VLF signal on a signal line located at an exit of the store, the VLF signal capable of being detected by the VLF receiver of the wheel assembly when the shopping cart exits the store;</p>	<p>BEART Page 12, lines 13-27: “Leave store (past EAS loop or gate 4) . . . Detect field from EAS loop or gate 4 as the first customer pushes the trolley 8 out of the store.”</p> <p>LEESON Page 4, para. 3: “However cases will arise where a customer having selected items they require from shelves 12A - J do not proceed to the plurality 16 of checkouts so as to follow path P1 to proceed out of the store but choose for some reason to proceed along path P2 leading to the combined entrance and exit 13. The alarm readers will detect the presence of the information tag on the trolley and from the information stored in the network on control unit 20 that the trolley is in its first, locked state, category.”</p> <p>SCHWENINGER Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 2, lines 3-5: “When the carts are wheeled beyond the perimeter, an audio frequency signal automatically actuates the brake.”</p> <p>Col. 3, lines 33-36: “Transmitter 74 sends a low frequency signal in the five kilohertz range on the conductor or peripheral wire, and the signal is strong enough so that it can be picked up five to fifteen feet away.”</p> <p>PRATHER Col. 4, lines 18-22: “In another aspect of the invention, a process of preventing shopping cart theft comprising the steps of providing the shopping cart with a disabling device such as that described above, and generating a radio frequency along a perimeter of an area.”</p>
	<p>wherein the wheel assembly is configured to determine whether to activate</p>	<p>BEART Abstract: “A security system for protecting articles 8, the system comprising at least one Electronic Article Surveillance (EAS) loop 4, one Emitting Unit 7 and one Detecting Unit 9 attached to each article 8 to be protected, the Detecting Unit 9</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	<p>the brake in response to detection of the VLF signal by the VLF receiver based at least partly on whether the shopping cart enters into a checkout zone before exiting the store.</p>	<p>having means to detect electromagnetic fields emitted by the EAS loop 4 and the Emitting Unit 7 and to distinguish between them, and a means of causing an alarm if a predetermined sequence of fields is detected, eg if the detecting unit enters an establishment at entrance 1 and leaves via exit 3 without having first passed through checkout 6.”</p> <p>Page 12, lines 29-Page. 13, lines 21: “In this example, if the second customer is a criminal attempting a push-out they will not pass the checkout lane 6 before exiting...The Detecting Unit 9 has now detected the EAS field three times in a row since the last detection of the Emitting Unit 7 and immediately causes an alarm...Any attempt to leave without "recharging" the Detecting Unit 9 at the checkout lane 6 will cause a "debt" on the next exit and thus trigger an alarm.”</p> <p>LEESON</p> <p>Abstract: “The tag is normally in one state and changes to a second state whilst travelling on path P1 when it passes through a checkout 16 and payment for the goods is confirmed. The trolley may then leave the supermarket. Alternatively if the trolley moves along a second path P2 and payment for the goods is not received the tag changes from state 1 to state 3 and an alarm is triggered upon passing through the exit.”</p> <p>Page 3, para. 6-Page 4, para. 3: “Having completed the purchase transaction the customer passes along path P1 through the region of the reader U1 which reads the information tag on the trolley and passes it by way of the network the control unit 20 operates to record the trolley as now being in a second, unlocked state, category...However cases will arise where a customer having selected items they require from shelves 12A - J do not proceed to the plurality 16 of checkouts so as to follow path P1 to proceed out of the store but choose for some reason to proceed along path P2 leading to the combined entrance and exit 13. The alarm readers will detect the presence of the information tag on the trolley and from the information stored in the network on control unit 20 that the trolley is in its first, locked state, category. The control unit 20 will initiate an alarm such as a light or sound signal and cause a security panel to display a suitable message to enable staff to approach the entrance and exit 13, identify the trolley</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		and establish the reason for an attempt being made to remove from the store a trolley in a locked state.”
23	A process for controlling shopping cart usage, comprising:	<p>BEART Page 4, lines 16-18: “To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley.”</p> <p>LEESON Abstract: “A security system for use in a supermarket having at least one entrance and exit 13 consisting of an electronic tag located on a supermarket trolley.”</p> <p>SCHWENINGER Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 1, lines 5-7: “The present invention relates to brake constructions for a shopping cart wheel or the like, and particularly those which are activated by perimeter theft control signals.”</p> <p>PRATHER Col. 2, lines 48-52: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises.”</p>
	detecting entry of a shopping cart into a store;	<p>BEART Page 12, lines 13-27: “Collect trolley 8 from outside store and enter store (past EAS loop or gate 2) Detect field from EAS loop or gate 2 as a second customer pushes the trolley 8 back into the store.”</p> <p>LEESON Page 3, para. 6-Page. 4, para. 1: “To undertake shopping a customer with a store trolley enters the building 11 through combined entrance and exit 13. They pass into the general area of the shelves 12A – J within range of one or more of the locking readers L1 - L3 which read the trolley tag and, by means of the</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

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		<p>network, the control unit 20 operates to record the trolley as being in a first, locked state, category.”</p> <p>determining whether the shopping cart subsequently enters a checkout area of the store by monitoring, with a radio frequency (RF) transceiver of a wheel assembly of the shopping cart, packet transmissions in a 2.4 GHz frequency band from one or more devices mounted at the checkout area of the store;</p> <p>BEART Abstract: “A security system for protecting articles 8, the system comprising at least one Electronic Article Surveillance (EAS) loop 4, one Emitting Unit 7 and one Detecting Unit 9 attached to each article 8 to be protected, the Detecting Unit 9 having means to detect electromagnetic fields emitted by the EAS loop 4 and the Emitting Unit 7 and to distinguish between them.”</p> <p>Page 1, lines 23-24: “Various tag-construction and tag-detection methods are employed by these systems, operating at various frequencies from several 100Hz to 100kHz and above.”</p> <p>Page 2, lines 22-26: “The Emitting Unit comprises a processing means and an electromagnetic field generation means, the processing means being adapted to control the electromagnetic field generation means such that the emitted field is distinct in some characteristic way from that emitted by the EAS loop, for example but not limited to having a distinct frequency and/or pulse-rate.”</p> <p>Page 3, lines 12-14: “The processing means in each of the Emitting and Detecting means separately may be hard-wired logic (possibly within an ASIC), a microprocessor or micro-controller, in each case containing some amount of memory storage.”</p> <p>Page 3, lines 28-Page. 4, lines 3: “The alarm means of the Detecting Unit may be provided by one or more of the following: . . . radio frequency or other electromagnetic transmitter.”</p> <p>Page 4, lines 16-18: “To deter removal of the Detecting Unit it may be permanently manufactured into the article to be protected, for example as part of the handle or wheel of a supermarket trolley.”</p> <p>Page 12, lines 7-10: “In this embodiment, EAS loops or gates 4 are present at all the exits 3 of the supermarket store, and an</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>Emitting Unit 7 is located within or close to every point of payment, for example within each checkout lane 6 of the supermarket.”</p> <p>Page 12, lines 13-27: “Fill trolley 8 with goods and visit checkout lane 6 (past Emitting Unit 7) . . . Detect field from Emitting Unit 7 as a first customer pays at checkout lane 6.”</p> <p>LEESON</p> <p>Abstract: “A security system for use in a supermarket having at least one entrance and exit 13 consisting of an electronic tag located on a supermarket trolley.”</p> <p>Page 3, para. 5: “Each trolley used within the store carries a readable information tag which serves to uniquely identify the trolley by a reader device.”</p> <p>Page 4, para. 2: “In most cases the customer having selected the items they require will proceed to one of the checkout in the plurality 16 to pay for the selected items carried in their trolley. Having completed the purchase transaction the customer passes along path P1 through the region of the reader U1 which reads the information tag on the trolley and passes it by way of the network the control unit 20 operates to record the trolley as now being in a second, unlocked state, category. Hereafter the customer with their trolley can now pass out of the building by way of the combined entrance and exit 13. In the case of an ‘unlocked’ trolley the alarm readers A1, A2 will not sense a trolley being used for an illicit purpose.”</p> <p>SCHWENINGER</p> <p>Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 1, lines 5-7: “The present invention relates to brake constructions for a shopping cart wheel or the like, and particularly those which are activated by perimeter theft control signals.”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>Col. 2, lines 3-5: “When the carts are wheeled beyond the perimeter, an audio frequency signal automatically actuates the brake.”</p> <p>Col. 2, lines 8-10: “The brake assembly includes a toggle positionable alternatively in non-braking and braking positions relative to the wheel.”</p> <p>Col. 2, lines 31-32: “Also, there is adequate space for complicated circuit board or electronic controls inside the wheel.”</p> <p>Col. 3, lines 33-36: “Transmitter 74 sends a low frequency signal in the five kilohertz range on the conductor or peripheral wire, and the signal is strong enough so that it can be picked up five to fifteen feet away.”</p> <p>PRATHER</p> <p>Col. 2, lines 48-57: “Accordingly, it is a principal object of the present invention to provide for a shopping cart disabling assembly which will thwart the removal of the cart from the shopping market's premises by preventing the cart from being rolled away from the premises. Another object of the present invention is to provide a pair of redundant wheels on the shopping cart that work, in conjunction with the disabling assembly when it is actuated, to limit the range of motion in a forward pushing direction to purely circular motion.”</p> <p>Col. 3, lines 63-Col. 4, lines 17: “Sensor comprising means for transmitting a trigger signal when a magnetic field or audio frequency is detected.”</p> <p>Col. 6, lines 21-25: “The suspension assembly of the cart is disabled by a triggering signal, such as an audio, magnetic or radio frequency signal, which is detected when the cart is pushed past a signal emitting member, such as an underground cable or a line-of-sight emitter.”</p> <p>Col. 6, lines 26-28: “A sensor 130, mounted on the support 100, detects the triggering signal. The sensor transmits a disabling signal via a conduit 135 (eg, a wire) when a triggering signal is detected.”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	<p>subsequently detecting, with a very low frequency (VLF) receiver of the wheel assembly, a VLF signal transmitted on a signal line located at a store exit; and</p>	<p>BEART Page 12, lines 13-27: “Leave store (past EAS loop or gate 4) . . . Detect field from EAS loop or gate 4 as the first customer pushes the trolley 8 out of the store.”</p> <p>LEESON Page 4, para. 3: “However cases will arise where a customer having selected items they require from shelves 12A - J do not proceed to the plurality 16 of checkouts so as to follow path P1 to proceed out of the store but choose for some reason to proceed along path P2 leading to the combined entrance and exit 13. The alarm readers will detect the presence of the information tag on the trolley and from the information stored in the network on control unit 20 that the trolley is in its first, locked state, category.”</p> <p>SCHWENINGER Abstract: “For a shopping cart wheel, for example, a toggle brake assembly which can be automatically actuated by an audio frequency signal when the cart is taken out of a designated area.”</p> <p>Col. 2, lines 3-5: “When the carts are wheeled beyond the perimeter, an audio frequency signal automatically actuates the brake.”</p> <p>Col. 3, lines 33-36: “Transmitter 74 sends a low frequency signal in the five kilohertz range on the conductor or peripheral wire, and the signal is strong enough so that it can be picked up five to fifteen feet away.”</p> <p>PRATHER Col. 4, lines 18-22: “In another aspect of the invention, a process of preventing shopping cart theft comprising the steps of providing the shopping cart with a disabling device such as that described above, and generating a radio frequency along a perimeter of an area.”</p>
	<p>determining whether to activate a brake of the wheel assembly in response to the</p>	<p>BEART Abstract: “A security system for protecting articles 8, the system comprising at least one Electronic Article Surveillance (EAS) loop 4, one Emitting Unit 7 and one Detecting Unit 9 attached to each article 8 to be protected, the Detecting Unit 9</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	VLF signal based at least partly on the determination of whether the shopping cart entered the checkout area.	<p>having means to detect electromagnetic fields emitted by the EAS loop 4 and the Emitting Unit 7 and to distinguish between them, and a means of causing an alarm if a predetermined sequence of fields is detected, eg if the detecting unit enters an establishment at entrance 1 and leaves via exit 3 without having first passed through checkout 6.”</p> <p>Page 12, lines 29-Page. 13, lines 21: “In this example, if the second customer is a criminal attempting a push-out they will not pass the checkout lane 6 before exiting...The Detecting Unit 9 has now detected the EAS field three times in a row since the last detection of the Emitting Unit 7 and immediately causes an alarm...Any attempt to leave without “recharging” the Detecting Unit 9 at the checkout lane 6 will cause a “debt” on the next exit and thus trigger an alarm.”</p> <p>LEESON</p> <p>Abstract: “The tag is normally in one state and changes to a second state whilst travelling on path P1 when it passes through a checkout 16 and payment for the goods is confirmed. The trolley may then leave the supermarket. Alternatively if the trolley moves along a second path P2 and payment for the goods is not received the tag changes from state 1 to state 3 and an alarm is triggered upon passing through the exit.”</p> <p>Page 3, para. 6-Page 4, para. 3: “Having completed the purchase transaction the customer passes along path P1 through the region of the reader U1 which reads the information tag on the trolley and passes it by way of the network the control unit 20 operates to record the trolley as now being in a second, unlocked state, category...However cases will arise where a customer having selected items they require from shelves 12A - J do not proceed to the plurality 16 of checkouts so as to follow path P1 to proceed out of the store but choose for some reason to proceed along path P2 leading to the combined entrance and exit 13. The alarm readers will detect the presence of the information tag on the trolley and from the information stored in the network on control unit 20 that the trolley is in its first, locked state, category. The control unit 20 will initiate an alarm such as a light or sound signal and cause a security panel to display a suitable message to enable staff to approach the entrance and exit 13, identify the trolley</p>

**Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)**

Claim	Elements	PRIOR ART
		and establish the reason for an attempt being made to remove from the store a trolley in a locked state.”

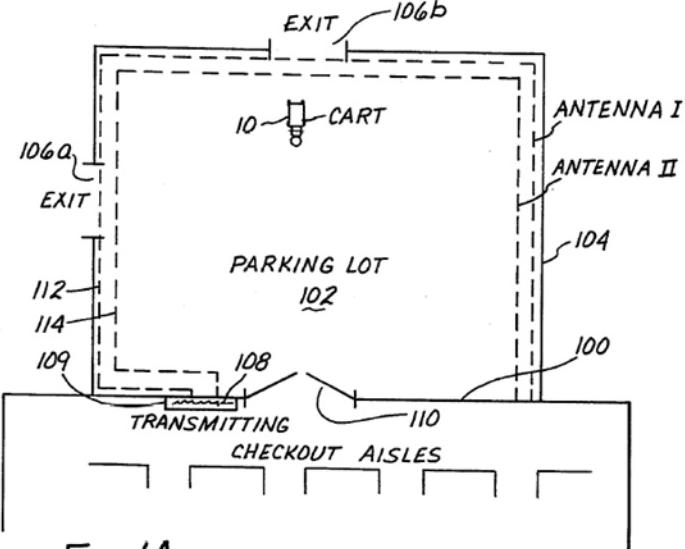
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Comparison of Claims 1, 2, 3, 4, 5, 6, 15 and 16 of the '072 Patent to U.S. Patent No. 6,125,972 to French ("French I"), U.S. Patent No. 5,357,182 to Wolfe ("Wolfe"), U.S. Patent No. 6,975,205 to French ("French II"), and U.S. Patent No. 7,058,528 to McCracken ("McCracken"). To the extent that French I, Wolfe, French II, and/or McCracken do not teach certain limitations of claim 1, such limitations would have been inherent and/or obvious. Claims 1, 2, 3, 4, 5, 6, 15 and 16 are also obvious in view of each reference alone or in combination with other prior art references, including, but not limited to, one or more of the references identified in the below chart.

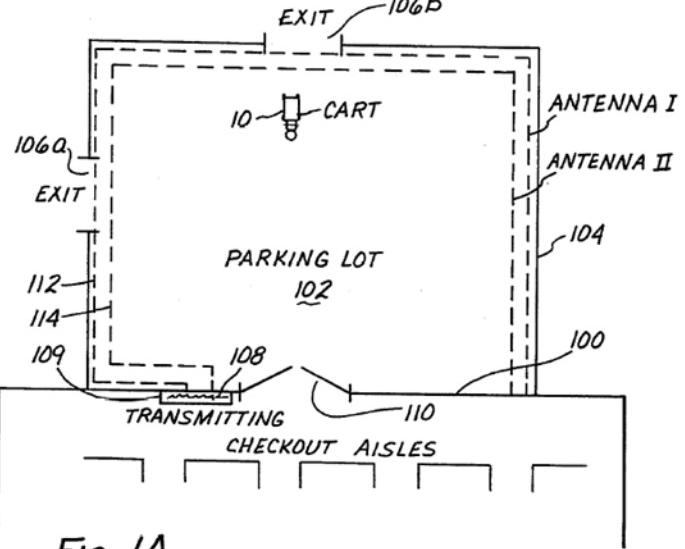
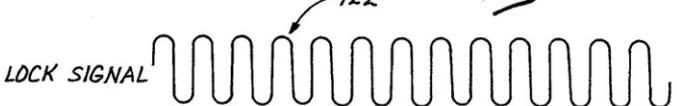
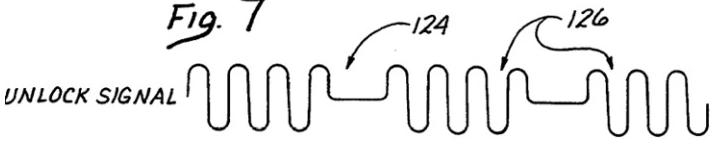
The following chart is meant to be exemplary only, and does not represent an exhaustive lists of evidence or contentions.

Claim	Elements	PRIOR ART
1	A system to detect whether a human-propelled cart having a wheel crosses a boundary, the system comprising:	FRENCH I Col. 6, lines 28-39: "The circuit includes a suitable sensor 56 which detects a signal at the outer perimeter of an area within which the shopping cart is to be kept. In the illustrated embodiment, a buried perimeter loop antenna 58 extends around the perimeter, and is connected to a suitable signal generator as illustrated in FIG. 7. Any suitable signal may be selected which is not liable to interference. In the illustrated embodiment, a triangle wave oscillator 60 is connected to 275 kHz sine wave oscillator 62, and the resultant output is connected via amplifier 64 to the loop antenna 58. It will be understood that other waveforms and frequencies may alternatively be used." WOLFE Abstract: "A system for braking a wheeled vehicle when it is attempted to be moved outside of a defined perimeter."
	a cable surrounding a containment area and defining a boundary of the containment area;	FRENCH I Col. 6, lines 28-39: "The circuit includes a suitable sensor 56 which detects a signal at the outer perimeter of an area within which the shopping cart is to be kept. In the illustrated embodiment, a buried perimeter loop antenna 58 extends around the perimeter, and is connected to a suitable signal generator as illustrated in FIG. 7. Any suitable signal may be selected which is not liable to interference. In the illustrated embodiment, a triangle wave oscillator 60 is connected to 275 kHz sine wave oscillator 62, and the resultant output is connected via amplifier 64 to the loop antenna 58. It will be understood that other waveforms and frequencies may alternatively be used." WOLFE

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		 <p>Fig. 1A</p>
	<p>a transmitter electrically connected to the cable and configured to transmit a radio frequency (RF) containment signal to the cable, the containment signal comprising an asymmetric, fluctuating component, the cable thereby generating an asymmetric, fluctuating magnetic field having three</p>	<p>FRENCH I Col. 6, lines 28-39: “The circuit includes a suitable sensor 56 which detects a signal at the outer perimeter of an area within which the shopping cart is to be kept. In the illustrated embodiment, a buried perimeter loop antenna 58 extends around the perimeter, and is connected to a suitable signal generator as illustrated in FIG. 7. Any suitable signal may be selected which is not liable to interference. In the illustrated embodiment, a triangle wave oscillator 60 is connected to 275 kHz sine wave oscillator 62, and the resultant output is connected via amplifier 64 to the loop antenna 58. It will be understood that other waveforms and frequencies may alternatively be used.”</p> <p>WOLFE Col. 6, lines 51-56: “The transmitter or transmitters 108 should be adapted to generate two different signals such as 122 and 124 (FIGS. 6 and 7), signal 122 being emitted from transmitter through antennae 112 and signal 124, from a second antennae 114.”</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	components; and	 <p>Fig. 1A</p> <p>Fig. 6</p>  
	the wheel comprising a receiver configured to detect the RF containment signal, the	<p>FRENCH I</p> <p>Col. 6, lines 23-26: "An actuator or receiver circuit is mounted in the module on a printed circuit board 52."</p> <p>Col. 6, lines 28-39: "The circuit includes a suitable sensor 56 which detects a signal at the outer perimeter of an area within which the shopping cart is to be kept. In the illustrated</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	receiver comprising:	<p>embodiment, a buried perimeter loop antenna 58 extends around the perimeter, and is connected to a suitable signal generator as illustrated in FIG. 7. Any suitable signal may be selected which is not liable to interference. In the illustrated embodiment, a triangle wave oscillator 60 is connected to 275 kHz sine wave oscillator 62, and the resultant output is connected via amplifier 64 to the loop antenna 58. It will be understood that other waveforms and frequencies may alternatively be used."</p>
		<img alt="A detailed cross-sectional diagram of a receiver circuit assembly. The diagram shows a central circular component with various internal parts labeled with numbers such as 14, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54, 56, 60, 62, 64, 72, 74, 76, 78, 80, 82, 84, 86, 88, 90, 92, 94, 96, 98, 100, 102, 104, 106, 108, 110, 112, 114, 116, 118, 120, 122, 124, 126, 128, 130, 132, 134, 136, 138, 140, 142, 144, 146, 148, 150, 152, 154, 156, 158, 160, 162, 164, 166, 168, 170, 172, 174, 176, 178, 180, 182, 184, 186, 188, 190, 192, 194, 196, 198, 200, 202, 204, 206, 208, 210, 212, 214, 216, 218, 220, 222, 224, 226, 228, 230, 232, 234, 236, 238, 240, 242, 244, 246, 248, 250, 252, 254, 256, 258, 260, 262, 264, 266, 268, 270, 272, 274, 276, 278, 280, 282, 284, 286, 288, 290, 292, 294, 296, 298, 300, 302, 304, 306, 308, 310, 312, 314, 316, 318, 320, 322, 324, 326, 328, 330, 332, 334, 336, 338, 340, 342, 344, 346, 348, 350, 352, 354, 356, 358, 360, 362, 364, 366, 368, 370, 372, 374, 376, 378, 380, 382, 384, 386, 388, 390, 392, 394, 396, 398, 400, 402, 404, 406, 408, 410, 412, 414, 416, 418, 420, 422, 424, 426, 428, 430, 432, 434, 436, 438, 440, 442, 444, 446, 448, 450, 452, 454, 456, 458, 460, 462, 464, 466, 468, 470, 472, 474, 476, 478, 480, 482, 484, 486, 488, 490, 492, 494, 496, 498, 500, 502, 504, 506, 508, 510, 512, 514, 516, 518, 520, 522, 524, 526, 528, 530, 532, 534, 536, 538, 540, 542, 544, 546, 548, 550, 552, 554, 556, 558, 560, 562, 564, 566, 568, 570, 572, 574, 576, 578, 580, 582, 584, 586, 588, 590, 592, 594, 596, 598, 600, 602, 604, 606, 608, 610, 612, 614, 616, 618, 620, 622, 624, 626, 628, 630, 632, 634, 636, 638, 640, 642, 644, 646, 648, 650, 652, 654, 656, 658, 660, 662, 664, 666, 668, 670, 672, 674, 676, 678, 680, 682, 684, 686, 688, 690, 692, 694, 696, 698, 700, 702, 704, 706, 708, 710, 712, 714, 716, 718, 720, 722, 724, 726, 728, 730, 732, 734, 736, 738, 740, 742, 744, 746, 748, 750, 752, 754, 756, 758, 760, 762, 764, 766, 768, 770, 772, 774, 776, 778, 780, 782, 784, 786, 788, 790, 792, 794, 796, 798, 800, 802, 804, 806, 808, 810, 812, 814, 816, 818, 820, 822, 824, 826, 828, 830, 832, 834, 836, 838, 840, 842, 844, 846, 848, 850, 852, 854, 856, 858, 860, 862, 864, 866, 868, 870, 872, 874, 876, 878, 880, 882, 884, 886, 888, 890, 892, 894, 896, 898, 900, 902, 904, 906, 908, 910, 912, 914, 916, 918, 920, 922, 924, 926, 928, 930, 932, 934, 936, 938, 940, 942, 944, 946, 948, 950, 952, 954, 956, 958, 960, 962, 964, 966, 968, 970, 972, 974, 976, 978, 980, 982, 984, 986, 988, 990, 992, 994, 996, 998, 1000, 1002, 1004, 1006, 1008, 1010, 1012, 1014, 1016, 1018, 1020, 1022, 1024, 1026, 1028, 1030, 1032, 1034, 1036, 1038, 1040, 1042, 1044, 1046, 1048, 1050, 1052, 1054, 1056, 1058, 1060, 1062, 1064, 1066, 1068, 1070, 1072, 1074, 1076, 1078, 1080, 1082, 1084, 1086, 1088, 1090, 1092, 1094, 1096, 1098, 1100, 1102, 1104, 1106, 1108, 1110, 1112, 1114, 1116, 1118, 1120, 1122, 1124, 1126, 1128, 1130, 1132, 1134, 1136, 1138, 1140, 1142, 1144, 1146, 1148, 1150, 1152, 1154, 1156, 1158, 1160, 1162, 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1828, 1830, 1832, 1834, 1836, 1838, 1840, 1842, 1844, 1846, 1848, 1850, 1852, 1854, 1856, 1858, 1860, 1862, 1864, 1866, 1868, 1870, 1872, 1874, 1876, 1878, 1880, 1882, 1884, 1886, 1888, 1890, 1892, 1894, 1896, 1898, 1900, 1902, 1904, 1906, 1908, 1910, 1912, 1914, 1916, 1918, 1920, 1922, 1924, 1926, 1928, 1930, 1932, 1934, 1936, 1938, 1940, 1942, 1944, 1946, 1948, 1950, 1952, 1954, 1956, 1958, 1960, 1962, 1964, 1966, 1968, 1970, 1972, 1974, 1976, 1978, 1980, 1982, 1984, 1986, 1988, 1990, 1992, 1994, 1996, 1998, 2000, 2002, 2004, 2006, 2008, 2010, 2012, 2014, 2016, 2018, 2020, 2022, 2024, 2026, 2028, 2030, 2032, 2034, 2036, 2038, 2040, 2042, 2044, 2046, 2048, 2050, 2052, 2054, 2056, 2058, 2060, 2062, 2064, 2066, 2068, 2070, 2072, 2074, 2076, 2078, 2080, 2082, 2084, 2086, 2088, 2090, 2092, 2094, 2096, 2098, 2100, 2102, 2104, 2106, 2108, 2110, 2112, 2114, 2116, 2118, 2120, 2122, 2124, 2126, 2128, 2130, 2132, 2134, 2136, 2138, 2140, 2142, 2144, 2146, 2148, 2150, 2152, 2154, 2156, 2158, 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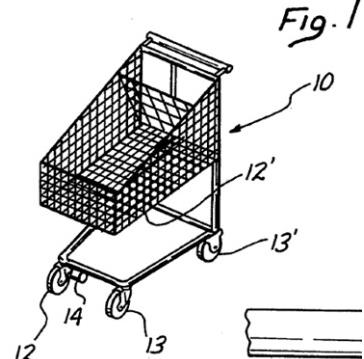
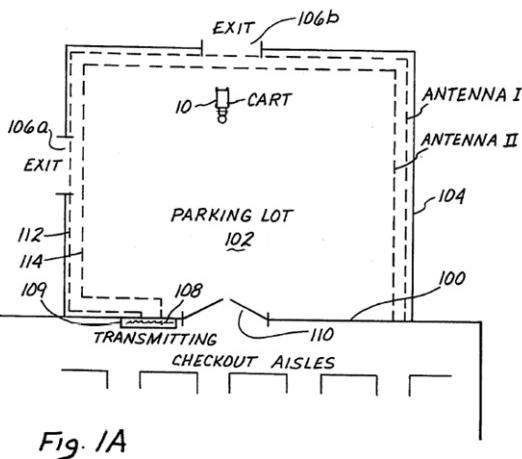
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	the asymmetric, fluctuating magnetic field, and	<p>motor 236. The limit switch 254 and a motion sensor switch 280 are both connected to the micro-controller.”</p> <p>WOLFE</p> <p>Col. 3, lines 47-50: “Coil L1 and condenser C1 form a resonant tank circuit 120 which is tuned to the frequency of the signal in the antenna 112 surrounding the perimeter of the parking lot 102 (FIG. 1A).”</p>
	a hardware processor programmed to determine a direction of the cart relative to the boundary of the containment area based at least in part on the measured single component of the three components of the asymmetric, fluctuating magnetic field.	<p>FRENCH II</p> <p>Col. 9, lines 56-60: “As a shopping cart passes over this pair of loops, a change in inductance is first detected in one coil, then the other. Which coil “sees” the cart first indicates the direction the cart is moving, i.e., in or out of the cart corral.”</p> <p>Figure 12 Cart Detector circuit</p> <p>Figure 13 System Electronics</p>
2	2. The system of claim 1, wherein the human-propelled cart	<p>See Claim 1.</p> <p>FRENCH I</p> <p>Col. 10, lines 18-22: “FIGS. 13-15 illustrate a caster unit 120 with a security device or mechanism according to another embodiment</p>

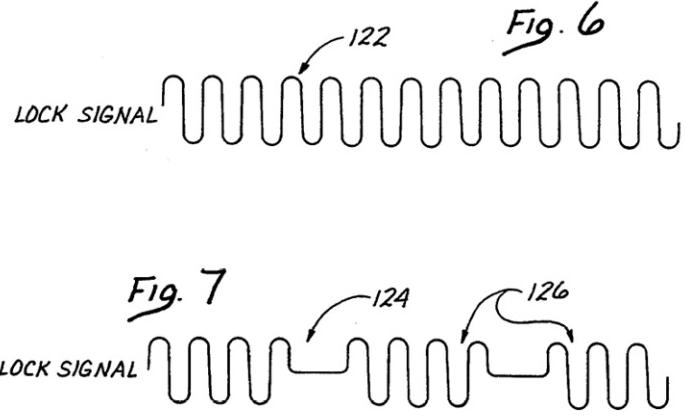
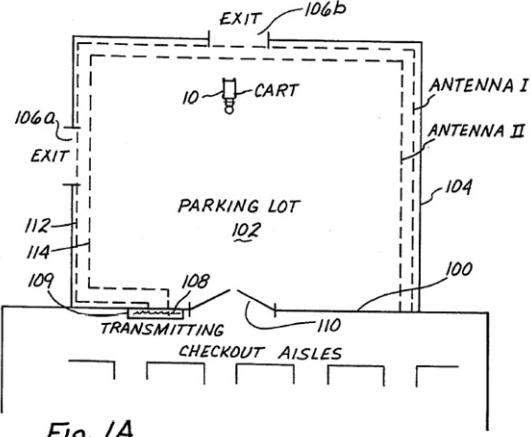
**Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)**

Claim	Elements	PRIOR ART
	<p>comprises a shopping cart.</p>	<p>of the invention for impeding movement of a shopping cart if a user attempts to remove the cart from a designated area."</p> <img alt="Technical drawings of a shopping cart wheel assembly. FIG. 13 shows a side view of a wheel hub with various internal components labeled (e.g., 120, 122, 124, 126, 128, 130, 132, 134, 135, 136, 138, 139, 140, 142, 143, 145, 146, 148, 150, 152, 153, 154, 155, 156, 158). FIG. 14 shows a front view of the wheel hub. FIG. 15 is a cross-sectional view of the wheel assembly showing internal structures like 127, 129, 130, 142, 144, 146, 148, 150, 152, 153, 154, 155, 156, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 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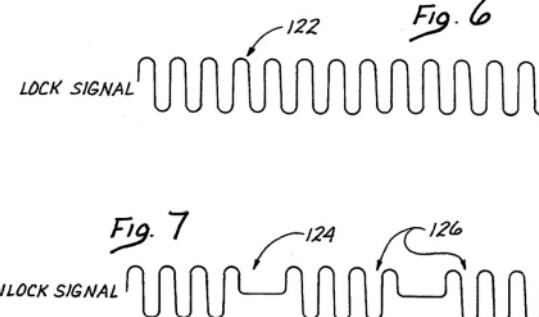
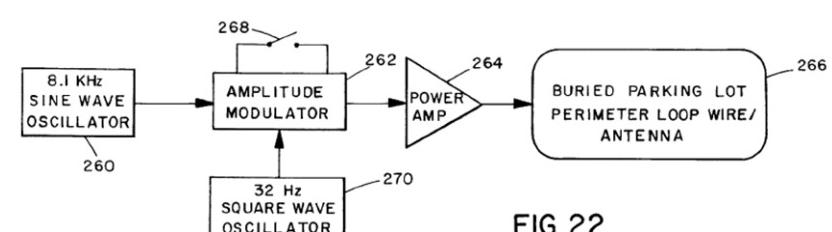
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>WOLFE</p> 
3	<p>The system of claim 1, wherein the asymmetric fluctuating component of the containment signal is invariant under inversion and phase shifting.</p>	<p>See Claim 1.</p> <p>WOLFE</p> <p>Col. 6, lines 2-12: “This signal 124 is in the form of periodic bursts 126 of specified numbers of pulses. These pulses 126 are coupled to counter IC2 which is periodically reset by oscillator OSC. The normal condition of the IC2 counter is a zero count forced each time OSC pulses the counter. If a specific number of pulses is received which causes Q6 to go high and stay high for a time period long enough to pass through low pass filter network R11 and C4, then this signal will cause a high signal on IC1 which will unlock the wheel 12.”</p> 

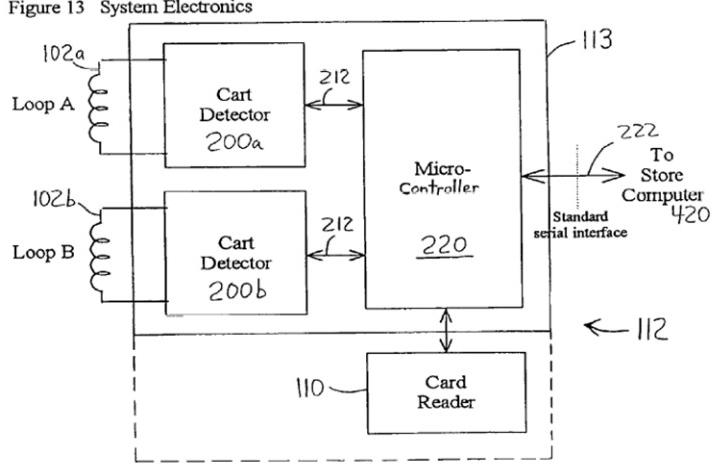
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		
4	The system of claim 1, wherein the asymmetric fluctuating component of the containment signal comprises a first sinusoidal component having a first frequency and a second sinusoidal component having a second frequency less than the first frequency.	<p>See Claim 1.</p> <p>WOLFE</p> 

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		
5	The system of claim 4, wherein a ratio of the second frequency to the first frequency is 1/2 or 2/3.	<p>See Claims 1, 4.</p> <p>MCCRACKEN</p> <p>Abstract: "Disclosed is method of controlling an asymmetric waveform generator including the steps of providing a reference timer signal, and generating an asymmetric waveform as a combination of a first sinusoidal wave having a first frequency and a second sinusoidal wave having a second frequency approximately twice the first frequency."</p>
6	The system of claim 4, wherein the first frequency and the second frequency are less than 9 kHz.	<p>See Claim 1, 4.</p> <p>FRENCH I</p>  <p>FIG. 22</p>
15	The system of claim 1, wherein the cart comprises an anti-theft system, and the system is further configured to	<p>See Claim 1.</p> <p>FRENCH II</p> <p>Col. 13, lines 53-67: "Referring to FIGS. 13 and 14, the microcontroller 220 uses the loop sensors 102 to determine if a cart has been pushed into the cart corral or pulled out. This is determined by looking at the timing of the two 'cart detected' signals from one cart lane (loops A and B). If the cart is detected first in the 'front' loop, the cart is going in, if first detected in the</p>

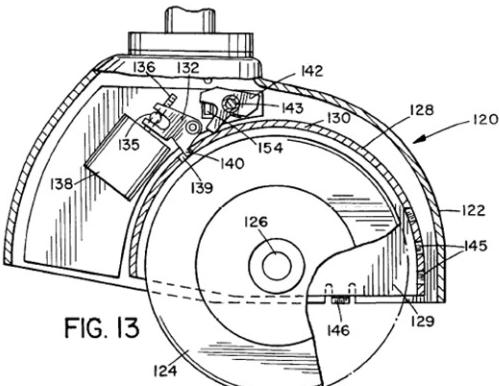
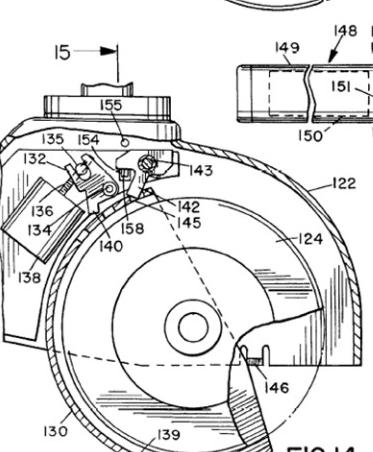
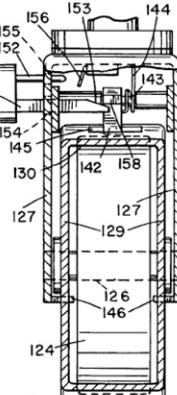
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
	trigger the anti-theft system in response to determining the cart crosses the boundary in a first direction and to not trigger the anti-theft system in response to determining the cart crosses the boundary in a second direction opposite to the first direction.	<p>'rear' loop, the cart is going out. If the cart is going out, this 'cart detected' signal is rejected and is ignored by the computer software. Once a cart is pushed all the way into the corral (both detectors indicate no cart present), the software internally records one cart 'count'. If a customer ID card is "swiped" through the card reader, that customer is credited with returning a cart. The customer ID code data is transmitted through the interface 222 to the store computer 420 (FIG. 16)."</p>  <p>Figure 13 System Electronics</p> <p>The diagram illustrates a system for monitoring shopping carts. It features two cart detectors, labeled 200a and 200b, which are connected to a central Micro-Controller 220. The Micro-Controller 220 is also connected to a Card Reader 110. A standard serial interface 222 connects the Micro-Controller 220 to a Store Computer 420. Two loops, Loop A and Loop B, are connected to the cart detectors 200a and 200b respectively. The Micro-Controller 220 has a feedback connection 112.</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	PRIOR ART
		<p>FIG. 14</p> <pre> graph TD Start(()) --> AOn{A ON?} AOn -- NO --> BOn{B ON?} BOn -- NO --> StartTimer1[START TIMER] BOn -- YES --> CartDetected{CART DETECTED?} CartDetected -- YES --> Wait50ms[WAIT 50 MS] Wait50ms --> AOnAgain{A ON?} AOnAgain -- NO --> StartTimer2[START TIMER] AOnAgain -- YES --> AOnWithin10s{A ON WITHIN 10 SECONDS?} AOnWithin10s -- NO --> WaitBothOff1[WAIT UNTIL A AND B ARE BOTH OFF] AOnWithin10s -- YES --> BOnAgain{B ON AGAIN?} BOnAgain -- NO --> StartTimer3[START TIMER] BOnAgain -- YES --> BOnAndAOff1{B ON AND A OFF WITHIN 10 SECONDS?} BOnAndAOff1 -- NO --> WaitBothOff2[WAIT UNTIL A AND B ARE BOTH OFF] BOnAndAOff1 -- YES --> CartMovingIn1[CART MOVING IN] CartMovingIn1 --> AOnAgain2{A ON?} AOnAgain2 -- NO --> BOnAgain2{B ON AGAIN?} BOnAgain2 -- NO --> CartFullyReturned1[CART FULLY RETURNED] BOnAgain2 -- YES --> AOnAndBOff1{A AND B OFF?} AOnAndBOff1 -- NO --> CartFullyReturned1 AOnAndBOff1 -- YES --> IndicateReturn1[INDICATE CART RETURN WITH LED AND SOUND] IndicateReturn1 --> End(()) </pre>
16	The system of claim 15, wherein the wheel comprises a brake configured to inhibit motion of the cart when the anti-theft system is triggered.	<p>See Claims 1, 15.</p> <p>FRENCH I</p> <p>Col. 10, lines 18-22: “FIGS. 13-15 illustrate a caster unit 120 with a security device or mechanism according to another embodiment of the invention for impeding movement of a shopping cart if a user attempts to remove the cart from a designated area.”</p>

Negotiation Communication – Inadmissible under FRE 408 (June 30, 2022)

Claim	Elements	PRIOR ART
		 <p>FIG. 13</p>  <p>FIG. 14</p>  <p>FIG. 15</p>

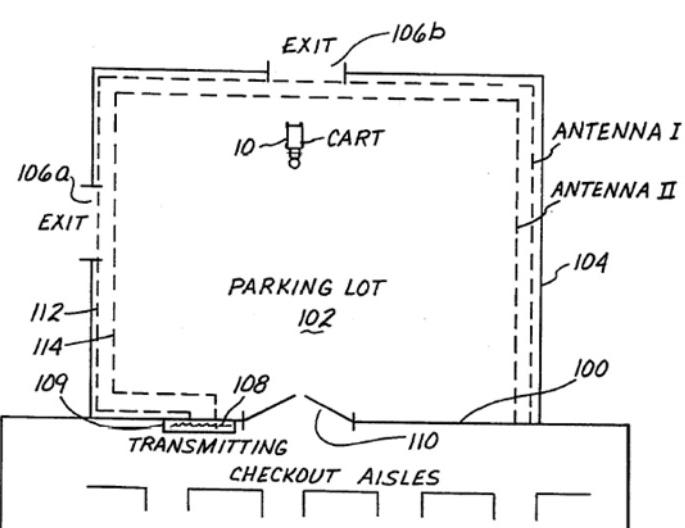
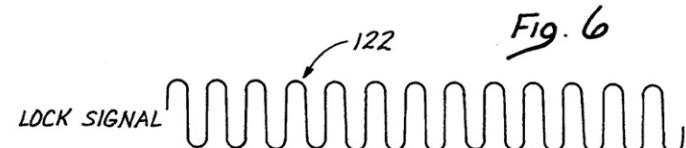
Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Comparison of Claim 1 of the '040 Patent to U.S. Patent No. 6,125,972 to French (“French”) and U.S. Patent No. 5,357,182 to Wolfe (“Wolfe”). To the extent that French or Wolfe do not teach certain limitations of claim 1, such limitations would have been inherent and/or obvious. Claims 1 is also obvious in view of each reference alone or in combination with other prior art references, including, but not limited to, one or more of the references identified in the below chart.

The following chart is meant to be exemplary only, and does not represent an exhaustive lists of evidence or contentions.

Claim	Elements
1	A system configured to detect whether an object crosses a boundary of a containment area, the system comprising: FRENCH Col. 6, lines 28-39: “The circuit includes a suitable sensor 56 which detects a signal at the outer perimeter of an area within which the shopping cart is to be kept. In the illustrated embodiment, a buried perimeter loop antenna 58 extends around the perimeter, and is connected to a suitable signal generator as illustrated in FIG. 7. Any suitable signal may be selected which is not liable to interference. In the illustrated embodiment, a triangle wave oscillator 60 is connected to 275 kHz sine wave oscillator 62, and the resultant output is connected via amplifier 64 to the loop antenna 58. It will be understood that other waveforms and frequencies may alternatively be used.”
	a receiver configured to detect a radio frequency (RF) containment signal near the boundary of the containment area, the RF containment signal comprising an asymmetric, time-varying component that is associated with an asymmetric, FRENCH Col. 6, lines 28-39: “The circuit includes a suitable sensor 56 which detects a signal at the outer perimeter of an area within which the shopping cart is to be kept. In the illustrated embodiment, a buried perimeter loop antenna 58 extends around the perimeter, and is connected to a suitable signal generator as illustrated in FIG. 7. Any suitable signal may be selected which is not liable to interference. In the illustrated embodiment, a triangle wave oscillator 60 is connected to 275 kHz sine wave oscillator 62, and the resultant output is connected via amplifier 64 to the loop antenna 58. It will be understood that other waveforms and frequencies may alternatively be used.” Col. 14, lines 48-57: “The receiver circuit 240 of FIG. 23 uses an inductor as an antenna. A capacitor in parallel with the inductor forms an LC resonator 272 at 8.1 kHz, which gives the receiver some selectivity at this frequency, rejecting interference from other signals. The resonator output is connected via amplifier 274 and

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements
	<p>time-varying magnetic field; rectifier 275 to a programmed micro-controller 276. The output of micro-controller 276 is connected via drive transistor 278 to the motor 236. The limit switch 254 and a motion sensor switch 280 are both connected to the micro-controller.”</p> <p><u>WOLFE</u></p>  <p><i>Fig. 1A</i></p>  <p><i>Fig. 6</i></p>  <p><i>Fig. 7</i></p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements	
	the receiver comprising: a resonant tank circuit having a single inductor circuit that has a single inductor axis,	<p>FRENCH</p> <p>Col. 14, lines 48-57: “The receiver circuit 240 of FIG. 23 uses an inductor as an antenna. A capacitor in parallel with the inductor forms an LC resonator 272 at 8.1 kHz, which gives the receiver some selectivity at this frequency, rejecting interference from other signals. The resonator output is connected via amplifier 274 and rectifier 275 to a programmed micro-controller 276. The output of micro-controller 276 is connected via drive transistor 278 to the motor 236. The limit switch 254 and a motion sensor switch 280 are both connected to the micro-controller.”</p> <p>WOLFE</p> <p>Col. 3, lns 47-50: “Coil L1 and condenser C1 form a resonant tank circuit 120 which is tuned to the frequency of the signal in the antenna 112 surrounding the perimeter of the parking lot 102 (FIG. 1A).”</p>
	wherein the single inductor circuit is configured to be responsive to a component of the asymmetric, time-varying magnetic field that is parallel to the single inductor axis; and	<p>WOLFE</p> <p>Col. 3, lns 47-50: “Coil L1 and condenser C1 form a resonant tank circuit 120 which is tuned to the frequency of the signal in the antenna 112 surrounding the perimeter of the parking lot 102 (FIG. 1A).”</p>
	a hardware processor programmed to: determine a direction of movement of the object relative to the boundary of the containment area based at least in part on	<p>WOLFE</p> <p>Col. 3, lines 64-68: “Thereby, when the wheel becomes braked by moving it across the field of radiation of the first antenna, it may be released from braking by backing it across the radiation field of the second antenna.”</p> <p>Col. 6, lines 7-12: If a specific number of pulses is received which causes Q6 to go high and stay high for a time period long enough to pass through low pass filter network R11 and C4, then this signal will cause a high signal on IC1 which will unlock the wheel 12.</p>

Negotiation Communication – Inadmissible under FRE 408
(June 30, 2022)

Claim	Elements
	the response of the single axis inductor circuit to the component of the asymmetric, time-varying magnetic field that is parallel to the single inductor axis.